Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.¹

PROMESA Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the Commonwealth, HTA, ERS, COFINA, and PBA.

ORDER GRANTING THREE HUNDRED EIGHTY-FOURTH OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO, THE PUERTO RICO SALES TAX FINANCING CORPORATION, AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO DEFICIENT, DUPLICATE, AND NO LIABILITY BOND CLAIMS

Upon the Three Hundred Eighty-Fourth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, the Puerto

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The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Rico Sales Tax Financing Corporation, and the Puerto Rico Public Buildings Authority to Deficient, Duplicate, and No Liability Bond Claims [ECF No. 17924] (the "Three Hundred Eighty-Fourth Omnibus Objection")² filed by the Commonwealth of Puerto Rico (the "Commonwealth"), the Puerto Rico Highways and Transportation Authority ("HTA"), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS"), the Puerto Rico Sales Tax Financing Corporation ("COFINA"), and the Puerto Rico Public Buildings Authority ("PBA," and together with the Commonwealth, HTA, ERS, and COFINA, the "Debtors"), dated August 20, 2021, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Three Hundred Eighty-Fourth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Eighty-Fourth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Eighty-Fourth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the Court having determined that the claims identified in Exhibit A to the Three Hundred Eighty-Fourth Omnibus Objection (the "Claims to Be Disallowed") seek recovery, in whole or in part, of amounts for which the Debtors are not liable; and the Court having determined that certain Claims to Be Disallowed also assert claims that are duplicative, in part, of one or more Master Proofs of Claim filed in the Debtors' Title III Case; and the Court having determined that certain portions of the Claims to Be Disallowed are deficient and/or seek recovery for investment losses; and the Court having determined that the relief sought in the Three Hundred Eighty-Fourth Omnibus Objection is in the

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Eighty-Fourth Omnibus Objection.

Case:17-03283-LTS Doc#:18465-1 Filed:10/11/21 Entered:10/11/21 19:11:20 Desc: Proposed Order Exhibit A Page 4 of 10

best interests of the Debtors, their creditors, and all parties in interest; and the Court having

determined that the legal and factual bases set forth in the Three Hundred Eighty-Fourth Omnibus

Objection establish just cause for the relief granted herein; and after due deliberation and sufficient

cause appearing therefor, it is hereby

ORDERED that the Three Hundred Eighty-Fourth Omnibus Objection is

GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their

entirety; and it is further

ORDERED that Prime Clerk, LLC, is authorized and directed to designate the

Claims to Be Disallowed as expunged on the official claims registry in the Title III Cases; and it

is further

ORDERED that this Order resolves Docket Entry No. 17924 in Case No. 17-3283; and it

is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters

arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated:	
	Honorable Judge Laura Taylor Swain
	United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Three Hundred Eighty-Fourth Omnibus Objection

Case:17-03283-LTS Doc#:18465-1 Filed:10/11/21 Entered:10/11/21 19:11:20 Desc: Proposed Order Exhibit A Page 6 of 10

Three Hundred and Eighty-Fourth Omnibus Objection Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT		
1	ALEX, WILLIAM F & ELSIE 46-15 54TH ROAD MASPETH, NY 11378	4/14/2018	17 BK 03283-LTS	S Commonwealth of Puerto Rico	5683	\$ 53,341.84		
	Reason: Claimant asserts liability associated with bond(s) issued by the Puerto Rico these bond(s) in the Commonwealth case.	Infrastructure Fin	ancing Authority wl	hich is duplicative of one or more maste	er proofs of clain	n filed by the trustee of		
2	AMERICAN MODERN HOME INSURANCE COMPANY STEVE MACKIE CHIEF COMPLIANCE & ETHICS OFFICER 7000 MIDLAND BLVD. AMELIA, OH 45102	4/23/2018	17 BK 03283-LTS	S Commonwealth of Puerto Rico	6790	\$ 1,039,275.20		
	Reason: Proof of claim seeks recovery for amounts for which the Commonwealth is associated with an entity, The Puerto Rico Public Finance Corporation, that is not a		e it asserts interests i	in note(s) that does not constitute a debt	t of the Common	wealth and are		
3	BONILLA CUEBAS, MIRTA 693 CALLE 44 - URB. FAIRVIEW SAN JUAN, PR 00926-7767	8/25/2020	19-BK-05523- LTS	Puerto Rico Public Buildings Authority (PBA)	174850^	Undetermined*		
	Reason: Claimant purports to assert liability associated with bond(s) issued by the P these bond(s) in the Puerto Rico Public Buildings Authority case.	Puerto Rico Public	Buildings Authority	which are duplicative of the master pro	oof(s) of claim fi	led by the trustee of		
	^Claim #174850 also contained on Exhibit A to the Three Hundred and Sixty-Secon	nd Omnibus Objec	tion for Claims to B	se Disallowed				
4	BOZZO NIEVES, VICTOR L. 693 CALLE 44 - URB. FAIRVIEW SAN JUAN, PR 00926-7767	8/25/2020	19-BK-05523- LTS	Puerto Rico Public Buildings Authority (PBA)	174822^	Undetermined*		
	Reason: Claimant purports to assert liability associated with bond(s) issued by the P these bond(s) in the Puerto Rico Public Buildings Authority case.	Puerto Rico Public	Buildings Authority	which are duplicative of the master pro	oof(s) of claim fi	led by the trustee of		
	^Claim #174822 also contained on Exhibit A to the Three Hundred and Sixty-Second Omnibus Objection for Claims to Be Disallowed							
5	BUSO TORRES, MARIA URB. OLYMPIC PARK 105 CALLE ATENAS LAS PIEDRAS, PR 00771	5/29/2018	17 BK 03283-LTS	S Commonwealth of Puerto Rico	30620	\$ 549,088.21		

Reason: Claim purports to assert, in part, liability based on an alleged ownership of COFINA Bonds, and thus seeks recovery for amounts for which the Commonwealth of Puerto Rico is not liable because the claims were (1) compromised and settled pursuant to the Settlement Order, and (2) released and discharged in accordance with the Plan and Amended Confirmation Order. Claimant also asserts, in part, investments in one or more mutual funds that in turn may have invested in bonds issued by the Commonwealth. The claim thus seeks recovery for an amount for which the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth and lacks standing to assert this derivative claim. Claimant also asserts, in part, liability based on an alleged ownership of GDB Bonds that were subject to the Qualifying Modification, which provided for the issuance of new securities in exchange for the cancellation of the GDB Bonds and the extinguishment of the Commonwealth's guarantee of certain GDB Bonds, and the highest the Commonwealth is no longer liable for these claims.

Proof of claim also purports to assert, in part, liabilities associated with bond(s) and/or money loaned, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth or any of the other Title III debtors. Proof of claim also seeks recovery, in part, for amounts for which the Commonwealth is not liable because it assert interests in note(s) for which bondholders have been receiving their payments in full, do not constitute a debt of the Commonwealth, and are associated with an entity, The Puerto Rico Aqueducts and Sewers Authority, that is not a Title III Debtor.

ASSEDTED CLAIM

^{*} Indicates claim contains unliquidated and/or undetermined amounts

Three Hundred and Eighty-Fourth Omnibus Objection Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT
6	DIGESARO, MARIO & LINDA 1015 84 ST BROOKLYN, NY 11228	5/22/2021	17 BK 03567-LTS	S Puerto Rico Highways and Transportation Authority	179267^	\$ 128,750.00
	Reason: Claimant asserts liability associated with one or more bonds issued by agent or trustee of these bond(s).	HTA that are duplicati	ve of one or more M	Master Proofs of Claim which were file	d in the HTA Title	III Case by the fiscal
	^Claim #179267 also contained on Exhibit A to the Three Hundred and Sixty-S	econd Omnibus Object	tion for Claims to B	Be Disallowed		
7	DIGESARO, MARIO & LINDA 1015 84 ST BROOKLYN, NY 11228	5/21/2021	19-BK-05523- LTS	Puerto Rico Public Buildings Authority (PBA)	179251^	\$ 946,653.20
	Reason: Claimant purports to assert liability associated with bond(s) issued by these bond(s) in the Puerto Rico Public Buildings Authority case.	he Puerto Rico Public	Buildings Authority	y which are duplicative of the master p	roof(s) of claim fil	ed by the trustee of
	^Claim #179251 also contained on Exhibit A to the Three Hundred and Sixty-S	econd Omnibus Object	tion for Claims to B	Be Disallowed		
8	GROVE, THOMAS 119 CEDAR STREET FRAMINGHAM, MA 01702	6/14/2018	17 BK 03283-LTS	S Commonwealth of Puerto Rico	69314	\$ 5,125.00
	Reason: Claimant asserts liability associated with bond(s) issued by the Puerto these bond(s) in the Commonwealth case.	Rico Infrastructure Fin	ancing Authority w	hich is duplicative of one or more mas	ter proofs of claim	filed by the trustee of
9	KNOX, SAMUEL AND LINDA 348 PACHECO SAN FRANCISCO, CA 94116	3/23/2018	17 BK 03283-LTS	S Commonwealth of Puerto Rico	3727	\$ 50,000.00
	Reason: Claimant asserts liability associated with bond(s) issued by the Puerto these bond(s) in the Commonwealth case.	Rico Infrastructure Fin	ancing Authority w	hich is duplicative of one or more mas	ter proofs of claim	filed by the trustee of
10	PARSON, BARBARA L. 8 PINE TREE CIRCLE RUSH, NY 14543	6/7/2021	19-BK-05523- LTS	Puerto Rico Public Buildings Authority (PBA)	179324^	\$ 40,000.00
	Reason: Claimant purports to assert liability associated with bond(s) issued by these bond(s) in the Puerto Rico Public Buildings Authority case.	he Puerto Rico Public	Buildings Authority	y which are duplicative of the master p	roof(s) of claim fil	ed by the trustee of
	^Claim #179324 also contained on Exhibit A to the Three Hundred and Sixty-S	econd Omnibus Object	tion for Claims to B	Be Disallowed		
11	PHYLLIS & BERNARD DEVORONINE JTW 8 TYLER BROOK ROAD KENNENBUNKPORT, ME 04046	4/3/2020	19-BK-05523- LTS	Puerto Rico Public Buildings Authority (PBA)	173737	\$ 15,000.00
	Reason: Claimant asserts secondarily insured notes whose original CUSIP num proof of claim filed by the trustee of these bond(s) in the Puerto Rico Public Bu			the Puerto Rico Public Buildings Auth	nority, which is du	plicative of the master

Three Hundred and Eighty-Fourth Omnibus Objection Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT
12	PRODUCTOS DE CANTERA, INC PO BOX 844 JUANA DIAZ, PR 00795	6/29/2018		ruerto Rico Sales Tax Financing Corporation (COFINA)	119754	\$ 60,412.50
	Reason: Claimant asserts liabilities associated with bonds issued by the Puerto Rico claimant sold the bonds they purport to assert, they no longer have any right to payn alleged unpaid interest and/or loss on investment.					
13	SOLA APONTE, LISETTE TERRALINDA 3 CALLE ARAGON CAGUAS, PR 00727	6/22/2018	17 BK 03283-LTS C	Commonwealth of Puerto Rico	51006	\$ 299,050.57
	Reason: Claimant asserts investments in one or more mutual funds that in turn may Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth is not liable because the claimant is not a "creditor" of the Commonwealth is not a "creditor" o				covery for an a	mount for which the
14	STILLMAN SHERMAN, BARBARA RAFAEL OJEDA-DIEZ ESQ. PO BOX 9023392 SAN JUAN, PR 00902-3392	5/28/2018		Commonwealth of Puerto Rico	23549	\$ 65,000.00
	Reason: Claimant asserts liability associated with bond(s) issued by the Puerto Rico these bond(s) in the Commonwealth case.	Infrastructure Fin	ancing Authority which	h is duplicative of one or more master	r proofs of clan	m filed by the trustee of
15	THE TRAVELERS INDEMNITY COMPANY AND CERTAIN OF ITS AFFILIATES TRAVELERS MARY C. DUFFY BOARDMAN 1 TOWER SQUARE, 0000-08MSA HARTFORD, CT 06183	5/29/2018	17 BK 03283-LTS C	Commonwealth of Puerto Rico	28347	\$ 33,000,000.00*
	Reason: Proof of claim seeks recovery for amounts for which the Commonwealth is associated with an entity, The Puerto Rico Public Finance Corporation, that is not a		e it asserts interests in n	note(s) that does not constitute a debt	of the Common	nwealth and are
16	THE TRAVELERS INDEMNITY COMPANY AND CERTAIN OF ITS AFFILIATES MARY C. DUFFY BOARDMAN TRAVELERS 1 TOWER SQUARE, 0000-08MSA HARTFORD, CT 06183	5/29/2018	17 BK 03283-LTS C	Commonwealth of Puerto Rico	26402	\$ 9,759,000.00*
	Reason: Proof of claim seeks recovery for amounts for which the Commonwealth is associated with an entity, The Puerto Rico Public Finance Corporation, that is not a full.					

Case:17-03283-LTS Doc#:18465-1 Filed:10/11/21 Entered:10/11/21 19:11:20 Desc: Proposed Order Exhibit A Page 9 of 10

Three Hundred and Eighty-Fourth Omnibus Objection Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT
17	TOMAS LOZANO-PEREZ AND LORRAINE M GRAY 359 OTIS STREET WEST NEWTON, MA 02465	5/22/2021		Puerto Rico Sales Tax Financing Corporation (COFINA)	179253^	\$ 14,312.00
	Reason: Claim purports to assert liability based on an alleged ownership of COFIN liable because the claims were (1) compromised and settled pursuant to the Settlem					
	^Claim #179253 also contained on Exhibit A to the Three Hundred and Sixty-Third	d Omnibus Objecti	on for Claims to Be D	Disallowed		
18	TOMAS LOZANO-PEREZ AND LORRAINE M GRAY 359 OTIS STREET WEST NEWTON, MA 02465	5/22/2021		Employees Retirement System of the Government of the Commonwealth of Puerto Rico	179252^	\$ 215,038.00
	Reason: Claimant asserts liability associated with one or more bonds issued by ERS ^Claim #179252 also contained on Exhibit A to the Three Hundred and Sixty-Seco	•			Fitle III Case b	y the fiscal agent.
19	TORRES, ARACELIA PO BOX 361204 SAN JUAN, PR 00936-1204	5/7/2018	17 BK 03566-LTS	Employees Retirement System of the Government of the Commonwealth of Puerto Rico	10814	\$ 60,000.00
	Reason: Claimant asserts, in part, liability against ERS associated with bond(s) issu Infrastructure Financing Authority bond claims against ERS, it has failed to provid extent the claim was intended to assert a claim against the Commonwealth, the clai Claimant also asserts, in part, liability associated with one or more bonds issued by	e a basis to assert s m is duplicative of	uch claims against ER one or more master p	RS arising from Puerto Rico Infrastructuoroofs of claim filed by the trustee of the	re Financing A ese bond(s) in t	Authority Bonds. To the the Commonwealth case
20	TORRES, ARACELLA PO BOX 361204 SAN JUAN, PR 00936-1204	8/27/2019	17 BK 03283-LTS	Commonwealth of Puerto Rico	170421^	\$ 10,000.00
	Reason: Claimant asserts liability associated with bond(s) issued by the Puerto Ricci these bond(s) in the Commonwealth case.	o Infrastructure Fir	nancing Authority whi	ich is duplicative of one or more master	proofs of clair	m filed by the trustee of
	^Claim #170421 also contained on Exhibit A to the Three Hundred and Sixty-Seco	ond Omnibus Object	tion for Claims to Be	Disallowed		
21	ZAPATA DOMINQUEZ, EDUARDO ROSARIO 129 URB. LA CONCEPCION CABO ROJO, PR 00623	5/7/2018		Employees Retirement System of the Government of the Commonwealth of Puerto Rico	14552	\$ 18,200.00*
	Reason: Claimant asserts, in part, liability against ERS associated with bond(s) issu	aed by the Puerto R	tico Public Finance Co	orporation. To the extent the claim seek	cs to assert Pue	erto Rico Public Finance

Corporation bond claims against ERS, it has failed to provide a basis to assert such claims against ERS arising from Puerto Rico Infrastructure Financing Authority Bonds. To the extent the claim was intended to assert a claim against the Commonwealth, the proof of claim seeks recovery for amounts for which the Commonwealth is not liable because it asserts interests in note(s) that does not constitute a debt of the Commonwealth and are associated with an entity, the Puerto Rico Public Finance Corporation, that is not a Title III Debtor. Claimant also asserts, in part, investments in one or more mutual funds that in turn may have invested in bonds issued by ERS. The claim thus seeks recovery for an amount for which the ERS is not liable because the claimant is not a "creditor" of the ERS and lacks standing to assert this derivative claim. Claimant also asserts, in part, liability associated with one or more bonds issued by ERS that are duplicative of the Master Proof of Claim which was filed in the ERS Title III Case by the fiscal agent.

ASSEDTED CLAIM

Three Hundred and Eighty-Fourth Omnibus Objection Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM#	ASSERTED CLAIM AMOUNT
22	ZINK, CHRISTOPHER R. 15118 ROCK CREEK DRIVE OMAHA, NE 68138	5/23/2018	17 BK 03283-LTS (Commonwealth of Puerto Rico	24817	\$ 20,000.00
	Reason: Claimant asserts liability associated with bond(s) issued by the Puerto Rico Infrastructure Financing Authority which is duplicative of one or more master proofs of claim filed by the trustee of these bond(s) in the Commonwealth case.					

TOTAL

\$ 46,348,246.52*